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CHEVRON CORPORATION

[Additional moving parties and counsel listed on  
following page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

MIKE M. MADANI, et al.,

Plaintiffs, on behalf of  
themselves and those  
similarly situated,

v.

SHELL OIL COMPANY; CHEVRON  
CORPORATION; and SAUDI  
REFINING, INC.,

Defendants.

**Case No. C 07-4296 MJJ**

**DECLARATION OF PETER E. DAVIDS IN  
SUPPORT OF DEFENDANTS' JOINT  
MOTION FOR TRANSFER OF VENUE**

**Date: December 18, 2007**

**Time: 9:30 a.m.**

**Dept.: Courtroom 11, 19th Floor**

**Judge: Hon. Martin J. Jenkins**

1 [Continued listing of moving parties and counsel]

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19 Attorneys for Defendant SAUDI REFINING, INC.

1 I, PETER E. DAVIDS, declare:

2 1. My name is Peter E. Davids. I am over the age of eighteen and have personal  
3 knowledge of the matters stated in this declaration except as otherwise noted. I am an attorney at  
4 the law firm Jones Day.

5 2. Exhibit A is a true and correct copy of the original complaint in *Dagher v. Saudi*  
6 *Refining, Inc.*, No. CV 99-06114 GKK (C.D. Cal.) ("*Dagher*"), filed on June 15, 1999.

7 3. Exhibit B is a true and correct copy of the operative second amended complaint in  
8 *Dagher*, filed on January 25, 2000.

9 4. Exhibit C is a true and correct copy of a stipulation and order dismissing the  
10 claims of Mike M. Madani in *Dagher*, filed on November 21, 2000.

11 5. Exhibit D is a true and correct copy of an excerpt from the transcript of the  
12 December 6, 1999 hearing before Judge King on defendants' motions to dismiss in *Dagher*.

13 6. Exhibit E is a true and correct copy of the docket report in *Dagher*. Based on my  
14 review of the record in *Dagher*, discovery began no later than April 2000 and ended no earlier  
15 than plaintiffs' designation of expert witnesses in June 2001.

16 7. Exhibit F is a true and correct copy of Local Rule 83-1.3.1 of the Central District  
17 of California, printed from the court's website (www.cacd.uscourts.gov) on October 27, 2007.

18 8. Exhibit G is a true and correct copy of General Order 05-06 of the Central District  
19 of California, printed from the court's website on October 27, 2007.

20 9. Based on my review of the record in *Dagher*, only one of the Motiva, Equilon,  
21 defendant, or third-party percipient witnesses deposed in that case testified that he resided in  
22 California.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st  
24 day of November 2007 in San Francisco, California.

25  
26 /S/ Peter E. Davids  
Peter E. Davids